

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

---

Patrick Berry, Henrietta Brown,  
Nadine Little, Dennis Barrow, Virginia Roy,  
Joel Westvig, Emmett Williams, *on behalf of  
themselves and a class of similarly-situated  
individuals*; and ZACAH,

Plaintiffs,

Civil File No. 20-cv-02189 WMW/KMM

**DECLARATION OF CORDELL  
WISEMAN IN OPPOSITION TO  
MOTION FOR A TEMPORARY  
RESTRAINING ORDER**

v.

Hennepin County; Hennepin County Sheriff  
David Hutchinson, *in his individual and official  
Capacity*; City of Minneapolis; Minneapolis Mayor  
Jacob Frey, *in his individual and official capacity*;  
Minneapolis Chief of Police Medaria Arradondo,  
*in his individual and official capacity*; Superintendent  
Al Bangoura, *in his individual and official capacity*;  
Park Police Chief at the Minneapolis Park and  
Recreation Board Jason Ohotto, *in his individual and official capacity*;  
Police Officers John Does; and Police Officers  
Jane Does,  
Defendants.

---

Your Declarant, Cordell Wiseman, states and affirms as follows:

1. I am employed by the Minneapolis Park and Recreation Board (MPRB) as the Director of Community Outreach. The Department of Community Outreach provides, among other operations, outreach to persons experiencing homelessness in the MPRB parks.

2. When homeless encampments began increasing in MPRB parks following the issuance of an Executive Order from the Governor's office and the passage by the Board of Park Commissioners of two MPRB resolutions related to homelessness in the parks, Community Outreach employees, including me, began daily outreach to all persons camping in the parks. This included monitoring the camps, speaking with the inhabitants and with the permit holders, and ensuring that the rules as set forth in Resolution 2020-267 were enforced. We also gave persons contacts for those who work to find permanent housing for the homeless and directed those in non-permitted parks to those with permits. Community Outreach has been at most of the removals.

3. When an encampment is to be disbanded, Community Outreach employees work with the inhabitants and permittees to assist them in finding alternative housing. We have worked with counterparts from the city, county and non-profits to meet the needs of homeless individuals. The police are only contacted to an encampment if requested by a Community Outreach employee.

4. When an encampment has been voluntarily vacated or is required to vacate, I worked closely with the persons living there and the permittees to ensure that any property left behind has been abandoned. I personally approve maintenance to remove abandoned property; they do not remove it without my approval. I am confident that any property that has been removed and discarded by the MPRB has been abandoned.

5. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed pursuant to 28 U.S.C. § 1746 on today's date, October 21, 2020.

s/Cordell Wiseman